

EXHIBIT B



U.S. Department of Justice

Andrew E. Lelling
United States Attorney
District of Massachusetts

Main Reception: (617) 748-3100

John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210

January 24, 2020

VIA E-MAIL

Brien O'Connor, Esq.
Ropes & Grey LLP
800 Boylston Street
Boston, Massachusetts 02199

Re: *United States v. Douglas Hodge*, No. 19-cr-10080-NMG

Dear Mr. O'Connor:

We write in response to your request for "any *Brady* material contained within the FBI Form 302 Reports and any underlying interviewing notes" related to Douglas Hodge.

As we have explained, it is a defendant's burden, in making such requests, to specify as to each request what evidence you hope to find, why you think it exists, and why such evidence would be both favorable to the defendant and material. *See United States v. Prochilo*, 629 F.3d 264, 268 (1st Cir. 2011). You have not even attempted to meet this burden.

Notwithstanding the foregoing, we have re-reviewed the FBI 302 reports of witness interviews in light of your request. Although we do not believe that any of the information contained therein constitutes *Brady* material, we are disclosing the following in an abundance of caution:

- Rick Singer has advised the government, in sum and in substance, that:

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED] despite
implying that a payment to the LMU coaches would be necessary to secure
[REDACTED] admission, Singer did not tell Hodge that Singer intended to keep all
of the money.

- [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED]
- [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED]
[REDACTED]

We are aware of the continuing nature of our discovery obligations, and we will continue to make additional disclosures as required.

Sincerely,

ANDREW E. LELLING
United States Attorney

By: /s/ Justin D. O'Connell
ERIC S. ROSEN
JUSTIN D. O'CONNELL
KRISTEN A. KEARNEY
LESLIE A. WRIGHT
Assistant U.S. Attorneys